



April 15, 2004

Ms. Jan Palumbo, RCRA Project Manager  
United States EPA, Region 10  
1200 Sixth Avenue, Mail Stop WCM-121  
Seattle, WA 98101

Subject: **April 15, 2004, Progress Report**  
**J.H. BAXTER ARLINGTON FACILITY**  
**Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the April 15, 2004, progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from March 15, 2004, to April 15, 2004.

#### **Significant Developments This Period**

This section discusses significant developments for the referenced reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- On March 24, 2004, the Environmental Protection Agency (EPA) designated Ms. Jan Palumbo as the new EPA Project Manager assigned to this project.
- The Drinking Water Well Sampling Report is included as Attachment 1. The report was prepared pursuant to Paragraph 51 of the AOC. The drinking water wells identified in the Drinking Water Sampling and Alternate Water Supply Work Plan were sampled biannually during four sampling events in June 2001, January 2002, July 2002, and January 2003. The samples were sent to a qualified analytical laboratory for analysis of pentachlorophenol and tetrachlorophenols. No pentachlorophenol or tetrachlorophenols were detected in any of the wells during the two-year period, and EPA has determined that the drinking water sampling program is complete and no additional sampling is required.
- On April 12, 2004 Baxter began conducting groundwater sampling in accordance with requirements of the Site Investigation (SI), State Waste Discharge Permit (SWDP), and



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closed wood waste landfill monitoring program. The sampling event also includes the three new groundwater monitoring wells.

### **Anticipated Developments Next Period**

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to implement elements of the SI Work Plan, including database compilation and data evaluation.

### **Anticipated Problems and Problem Resolution**

This section discusses anticipated problems, and planned resolution of past or anticipated problems.

No new problems or issues have been identified at the facility, other than those mentioned in previous progress reports.

### **Other Information**

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

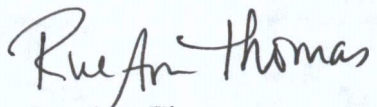
- Construction of the Stormwater Treatment System began on March 15, 2004, following receipt of selected permits from the City of Arlington. Initial activities included surveying of the site, excavation work on the south swale, wet well, and tank ringwell, as well as installation of the gravel pad for the plant.
- Baxter will continue excess stormwater treatment in accordance with the approved phased approach for stormwater management.

### **Certification**

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s),

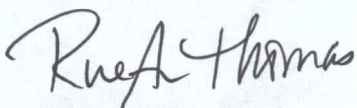


the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:   
Name: RueAnn Thomas  
Title: Environmental Programs Director  
Date: April 15, 2004

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (541) 689-3801.

Sincerely,



RueAnn Thomas  
Environmental Programs Director

cc: Jeanne Tran, Ecology  
Georgia Baxter, J. H. Baxter & Co.  
Mary Larson, J. H. Baxter & Co.  
J. Stephen Barnett, Premier Environmental Services, Inc.

**Attachment 1**

**Drinking Water Well Sampling Report**





**Drinking Water Well Sampling Report**  
**J.H. Baxter & Co.**  
**Arlington, Washington Facility**  
**April 13, 2004**

**Executive Summary**

This Drinking Water Well Sampling Report is prepared pursuant to Paragraph 51 of the Administrative Order on Consent between the U.S. Environmental Protection Agency and J.H. Baxter & Co. dated April 30, 2001. The drinking water wells identified in the Drinking Water Sampling and Alternate Water Supply Work Plan were sampled biannually during four sampling events in June 2001, January 2002, July 2002, and January 2003. The samples were sent to a qualified analytical laboratory for analysis of pentachlorophenol and tetrachlorophenols. No pentachlorophenol or tetrachlorophenols were detected in any of the wells during the two-year period. EPA has determined that the drinking water sampling program is complete and no additional sampling is required.

**Introduction**

This Drinking Water Well Sampling Report for the J.H. Baxter & Co.'s (Baxter) Arlington facility (Arlington facility) summarizes the results from the Drinking Well Sampling program developed and conducted pursuant to Paragraph 51 of the Administrative Order on Consent between the U.S. Environmental Protection Agency (EPA) and Baxter dated April 30, 2001 (AOC). This report fulfills the requirements of Paragraph 51i of the AOC. It provides background information about the Arlington facility, the purpose of drinking water sampling, how the sampling was conducted, and the results of the sampling.

**Site background**

The Arlington facility is a wood preserving operation that occupies approximately 52 acres of land. The facility is located in southwest Arlington, Washington, at 6520 188th Street NE, and lies southeast of the intersection of 67th Avenue NE and 188th Street NE.

The Arlington facility's primary business is the manufacture and preservation of utility poles. The Arlington facility imports raw logs and processes them into poles. Processing includes debarking, trimming, marking, seasoning, and treatment. Wood treatment has been conducted onsite since the mid to late 1960s, and utilizes pentachlorophenol as a treatment chemical.

**Purpose of the Drinking Water Well Sampling**

Beginning in June 2001, Baxter conducted semiannual monitoring of drinking water in 21 off-site drinking water wells. The purpose of the drinking water sampling was to determine if historical operations at the Arlington facility had affected drinking water in neighboring wells. The sampling activities were conducted in accordance with the AOC and the Drinking Water





Sampling and Alternate Water Supply Work Plan developed under the AOC and submitted to EPA.

### **Sampling Procedures**

In order to identify wells in the area, a drinking water well survey of the area around the Arlington facility (see attached Figure 1) was conducted by reviewing state water well databases, City water service records, and completing a door-to-door survey of residents in the surrounding area. The results of this survey are summarized in Table 1.

All functioning drinking water wells identified in the survey were sampled by Hart Crowser on behalf of Baxter. The water samples were collected from the nearest outside spigot or faucet in accordance with standard EPA sampling protocols. Drinking water well samples were collected biannually during four sampling events, which occurred in June 2001, January 2002, July 2002, and January 2003. Following sample collection, the water samples were submitted to Columbia Analytical Services of Kelso, Washington, a qualified analytical laboratory, for analysis of pentachlorophenol and tetrachlorophenols by EPA Method 8151M.

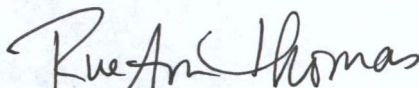
### **Sampling Results**

No pentachlorophenol or tetrachlorophenols were detected in any of the wells during the two-year period. In addition, EPA collected split samples in January 2002, which confirmed Baxter's sampling results. Based on these results, EPA has determined that drinking water well sampling can be discontinued.

### **Certification**

I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:



Name:

RueAnn Thomas

Title:

Environmental Programs Director



Table 1. Summary of Drinking Water Sampling Locations and Results

Well ID	Street Name	Well Sampled (yes/no)	Pentachlorophenol Sampling Results				Comments
			June 2001	January 2002	July 2002	January 2003	
10Q01	204th Place NE	yes	ND	ND	ND	ND	
10Q02	204th Place NE	yes	ND	ND	ND	ND	
10Q03	204th Place NE	yes	ND	ND	ND	ND	
10Q04	204th Place NE	yes	ND	ND	ND	ND	
10Q05	204th Place NE	yes	ND	ND	ND	ND	
10Q06	204th Place NE	yes	ND	ND	ND	ND	
10Q07	204th Place NE	yes	ND	ND	ND	ND	
10Q08	204th Place NE	yes	ND	ND	ND	ND	
15A01	67th Avenue NE	yes	ND	ND	ND	ND	
15B01	Cemetery Road	yes	ND	ND	ND	ND	
15B02	61st Drive NE	no	—	—	—	—	Water line is no longer connected, well has been out of use for three years - connected to City water
15B03	61st Drive NE	yes	ND	ND	ND	ND	
15B04	204th Place NE	yes	ND	ND	ND	ND	
15F01	Cemetery Road	yes	ND	ND	ND	ND	
15F02	Cemetery Road	yes	ND	ND	ND	ND	
15F03	Cemetery Road	yes	ND	ND	ND	ND	
15J01	67th Avenue NE	no	—	—	—	—	Pressure tank removed, no plans to use the well - connected to City water
22H01	67th Avenue NE	no	—	—	—	—	Water lines are cut, pump is inoperable, no plans to use the well - connected to City water
22H02	67th Avenue NE	yes	ND	ND	ND	ND	
22H03	67th Avenue NE	no	—	—	—	—	Pump is inoperable, no plans to use the well - connected to City water
22J01	67th Avenue NE	yes	ND	ND	ND	ND	
22J02	67th Avenue NE	yes	ND	ND	ND	ND	
22L01	Arlington Airport	yes	ND	ND	ND	ND	
22M01	67th Avenue NE	no	—	—	—	—	Well is not in use - connected to City water
23D01	67th Avenue NE	yes	ND	ND	ND	ND	
23D02	188th Street NE	yes	ND	ND	ND	ND	

Notes:

ND = Not detected above the method reporting limit of 0.5 micrograms per liter

All analyses of pentachlorophenol and total tetrachlorophenols by U.S. Environmental Protection Agency Method 8151M.

All analyses performed by Columbia Analytical Services of Kelso, Washington.

EPA collected split samples in January 2002 - all results were "not detected".



